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August 7, 2025

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Tal Alexander*, Docket No. 24-CR-00676 (VEC)

Dear Judge Caproni:

On behalf of Defendant Tal Alexander (“Tal”), we respectfully request to file Tal’s reply memorandum in support of his motion to suppress evidence (ECF 136) and accompanying supplemental declaration of Milton Williams (ECF 136-1) with redactions. Redactions are justified for the same reasons delineated in our prior request for redactions with respect to Tal’s initial motion to suppress (ECF 113), which we incorporate herein. The filed documents each contain information that may identify alleged victims and government witnesses, infringes on their privacy interests, and with respect to the reply memorandum, describes juvenile conduct. The Government consents to these redactions.

As the Court found previously with respect to Tal’s motion to suppress (*see* ECF 116), the filed materials are “judicial documents” to which the common law right of public access attaches; the weight of that presumption is moderate; and the interests in protecting the privacy of alleged victims and witnesses outweigh that presumption. *See United States v. Akhavan*, 532 F. Supp. 3d 181, 184 (S.D.N.Y. 2021) (quoting *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006)). The same analysis applies here and warrants redactions.

We will also submit highlighted proposed redactions for in camera review, as required by Your Honor’s Individual Criminal Rule 3(A)(1).

Respectfully submitted,

/s/ Milton L. Williams

Milton L. Williams

Deanna Paul

Alexander Kahn

Attorneys for Defendant Tal Alexander

cc: All counsel via ECF

Application GRANTED. The materials to be filed in redacted form are "judicial documents" to which the common law right of public access attaches. *United States v. Akhavan*, 532 F. Supp. 3d 181, 184 (S.D.N.Y. 2021) (quoting *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006)). The weight of that presumption is moderate, as the Court will consider those documents in connection with ruling on Defendant's motion to suppress, but the documents do not bear on the "adjudication of a dispositive motion." *Id.* at 185. The interests in protecting the privacy of alleged victims and witnesses and maintaining the confidentiality of ongoing investigations, as well as the sensitive nature of certain juvenile conduct, outweigh that presumption.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

8/19/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE